

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:	§	Chapter 11 Case
	§	
Old LC, Inc., <i>et al.</i> ¹	§	Case No. 19-11791 (BLS)
	§	
Debtors.	§	Jointly Administered

Official Committee of Unsecured Creditors of Old LC, Inc., et al., for and on behalf of the estates of Old LC, Inc., <i>et al.</i> ;	§	
	§	
	§	
<i>Plaintiff,</i>	§	
	§	
v.	§	Adv. No. 20-51002 (BLS)
	§	
Upfront V, LP, Breakwater Credit Opportunities Fund, L.P.; Upfront GP V, LLC; Mark Suster; Dana Kibler; Gregory Bettinelli; Saif Mansour; Aamir Amdani; Eric Beckman; Darrick Geant; and Joseph Kaczorowski	§	
	§	
<i>Defendants.</i>	§	

**PLAINTIFF’S AMENDED NOTICE TO TAKE ORAL DEPOSITION OF DEFENDANT
JOSEPH KACZOROWSKI**

TO: Joseph Kaczorowski
c/o Jody C. Barillare
MORGAN, LEWIS & BOCKIUS LLP
1201 N. Market Street, Suite 2201
Wilmington, Delaware 19801

PLEASE TAKE NOTICE that pursuant to Federal Rule of Bankruptcy Procedure 9016 and Federal Rule of Civil Procedure 45(a)(4), Plaintiff Official Committee of Unsecured Creditors of Old LC, Inc., et al., for and on behalf of the estates of Old LC, Inc., *et al.* (the “Plaintiff”) hereby notifies all parties to this action and their counsel of record of Plaintiff’s intention to take the oral deposition of Joseph Kaczorowski. This deposition will take place by Zoom video conference on

¹ The Debtors are the following four entities (the last four digits of their respective taxpayer identification numbers, if any, follow in parentheses): Old LC, Inc. (7119), Old LC Holdings, Inc., Old LCF, Inc., and Old LC Parent, Inc. The Debtors’ noticing address in these Chapter 11 cases is c/o Bryan Cave Leighton Paisner LLP, Attn: Mark I. Duedall, 1201 W. Peachtree Street, 14th Floor, Atlanta, Georgia 30309.

Wednesday, September 8, 2021, at 9:30 a.m. pacific, and continue thereafter from hour to hour and day to day until completed. This deposition will be conducted pursuant to, and in accordance with, the Federal Rules of Civil Procedure before a certified court reporter. This deposition will be recorded stenographically and will be videotaped.

Dated: August 9, 2021
Wilmington, Delaware

Respectfully submitted,

MORRIS JAMES LLP

/s/ Jeffrey R. Waxman
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Counsel for Plaintiff

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served pursuant to the Federal Rules of Bankruptcy Procedure on this 9th day of August, 2021.

/s/ Joel B. Bailey
Joel B. Bailey